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April 13, 1999

VIA FACSIMILE AND U.S. MAIL

F. Andrew Turley, Esq.
Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
APR 15 3 28 PM '99

Re: MUR 4865; National Rifle Association; Wayne LaPierre

Dear Mr. Turley:

We have received your letter of March 30, 1999 and its enclosures, including Weldon Clark's letter to Lawrence Noble, dated March 15, 1999.

Mr. Clark's new letter adds nothing of substance to his prior letter "complaint." As explained in my January 15, 1999 letter to Mr. Noble, Mr. Clark's communications are merely an attempt to involve the Commission in on-going political and policy disputes with a private political association.

Mr. Clark's new letter provides only the names and addresses of additional persons who purportedly have unspecified information regarding Mr. Clark's vague, unsupported allegations. This information does not cure the deficiencies, which I previously described, in Mr. Clark's prior materials: they do not even remotely meet the threshold procedural requirements necessary to support the commencement of an FEC investigation. Since these requirements have not been met, it would not be appropriate for the FEC to proceed further on this matter.

Mr. Clark's inquiry regarding "protection" for complainants is similarly baseless. We are unaware of any law or regulation which would authorize the Commission to interfere in the decision of a private political association to dismiss one of its members for disruptive behavior and disloyalty. Indeed, such interference would encroach upon the association's constitutionally protected activities of speech and association. Moreover, Mr. Clark appears to have alleged, not that the NRA has actually retaliated against him, but that the NRA is considering a recommendation which may result in the termination of his membership, and that he has been

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offered a hearing. We would, of course, expect to receive, in advance of the hearing if possible, copies of any advice or information which you provide Mr. Clark concerning this subject.

In sum, it would appear that Mr. Clark's new grievance is evidence of nothing other than the weakness of the underlying allegations, which are so vague and incoherent as to be virtually meaningless. Accordingly, we reiterate our request that no action be taken on this matter.

Very truly yours,



Charles J. Cooper

cc: Lawrence Noble, Esq.